

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

**SAMSUNG’S CORRECTED UNOPPOSED MOTION TO WITHDRAW ITS OPPOSED
MOTION TO COMPEL HEADWATER TO PROVIDE SIGNED AUTHORIZATION
FOR QUALCOMM TO RELEASE DR. GREGORY RALEIGH’S EMPLOYMENT
RECORDS (D.I. 105)**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) hereby files this Unopposed Motion to Withdraw its Opposed Motion to Compel Headwater to Provide Signed Authorization for Qualcomm to Release Dr. Gregory Raleigh’s Employment Records (D.I. 105). Although Samsung’s efforts to obtain the signed authorization form without resorting to motion practice were unsuccessful, Plaintiff has now provided such form to Samsung. Thus, Samsung respectfully requests that the Court grant its request to withdraw its Opposed Motion to Compel (D.I. 105) without prejudice to its ability to file any Motion to Compel in the future to the extent the Court may permit. Plaintiff Headwater Research LLC does not oppose this motion.

Dated: February 22, 2024

Respectfully submitted,

By: /s/ Jared Hartzman

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have met and conferred in compliance with Local Rule CV-7(h). Plaintiff does not oppose this motion.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on February 22, 2024. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Jared Hartzman